

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

WILHEN HILL BARRIENTOS, et al.,

Plaintiffs,

v.

CORECIVIC, INC.,

Defendant.

Civil Action No. 4:18-cv-00070-CDL

**DEFENDANT CORECIVIC'S NOTICE OF OBJECTIONS TO PLAINTIFFS'
DESIGNATED DEPOSITION TESTIMONY**

Pursuant to the Court's July 7, 2023 Order Setting Pretrial Conference (ECF 303 at 4), Defendant CoreCivic provides notice of the following objections Plaintiff's designated and counter-designated deposition testimony.

October 14, 2021 Deposition of Droured Blackmon

Plaintiffs' Designation	Defendant's Objection(s)
12:12 - 12:17	
13:5 - 13:11	
13:17 - 13:23	
34:8 - 34:15	
35:6 - 36:19	
38:10 - 38:14	
38:22 - 39:6	
39:14 - 40:24	401, 402, 403. Also, 602 with respect to 39:21 – 40:3.

Plaintiffs' Designation	Defendant's Objection(s)
41:20 – 44:23	
44:24 – 45:4	701.
45:5 - 46:8	
49:16 - 50:6	
63:22 - 64:8	
64:12 - 65:9	
65:24 - 66:17	
81:18 - 81:23	
89:8 - 90:3	
92:4 - 92:23	
93:20 - 94:21	
109:9 - 109:12	
110:6 - 110:14	
110:22 - 110:25	
111:11 - 111:17	
112:6 - 113:7	
113:12 - 113:24	
133:4 - 133:11	
134:9 - 134:12	
135:22 - 136:23	
137:12 - 137:23	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
138:16 - 139:5	401, 402, 403.
140:11 - 141:2	401, 402, 403.
142:6 - 142:12	401, 402, 403.
143:2 - 143:9	401, 402, 403.
164:8 - 164:22	
165:11 - 165:18	
168:19 - 169:21	
188:4 - 189:16	
192:7 - 192:20	
195:3 - 195:16	
196:7 - 196:10	
196:16 - 196:20	
197:5 - 197:12	
197:20 - 198:15	
206:22 – 207:11	
207:12 - 208:2	401, 402, 403, 602. Defendant conditionally counter-designates 208:3-14, if those objections are overruled.
208:15 - 210:3	401, 402, 403, 602. Defendant conditionally counter-designates 210:4-7 and 210:14-18, if those objections are overruled.
211:2 - 211:11	
213:17 - 214:6	

November 10, 2021 Deposition of Calvin Blue

Plaintiffs' Designation	Defendant's Objection(s)
16:10 - 16:22	
19:2 - 19:7	401, 402, 403.
19:12 - 19:18	401, 402, 403.
20:18 - 21:7	
24:15 - 24:25	
25:7 - 25:22	
27:16 - 27:23	401, 402, 403.
28:4 - 28:24	
43:22 - 44:15	
45:2 - 45:4	
46:5 - 46:10	
47:6 - 47:16	
48:18 - 49:11	
50:22 - 51:17	
53:11 - 55:18	401, 402, 403.
60:11 - 64:15	
72:16 - 76:16	401, 402, 403.
101:6 - 101:14	
108:21 - 109:3	401, 402, 403, 602.
109:9 - 109:14	401, 402, 403, 602.

Plaintiffs' Designation	Defendant's Objection(s)
110:6 - 111:7	401, 402, 403, 602.
118:22 - 119:21	401, 402, 403.
123:5 - 123:15	
123:19 - 123:25	401, 402, 403.
124:13 - 124:18	
124:22 - 125:8	
126:5 - 127:4	
131:16 - 132:12	
136:7 - 138:3	401, 402, 403, 602.
140:21 - 141:23	
159:25 - 160:5	
161:6 - 161:25	
171:5 - 171:24	
192:6 - 193:6	
197:6 - 199:9	
199:23 - 200:3	
200:19 - 200:22	
200:23 - 201:21	
206:25 - 207:5	
225:24 - 227:19	401, 402, 403, 602.
228:19 - 230:10	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
230:19 - 231:10	401, 402, 403.
231:12 - 233:12	401, 402, 403. Also, 602 with respect to 232:13 – 233:6.
247:25 - 248:11	
260:6 - 263:13	401, 402, 403. Also, 602 with respect to 263:4-13.
265:25 - 269:9	401, 402, 403.
272:4 - 274:9	401, 402, 403. Also, 801, 802, 805 with respect to 273:12 – 274:9.
277:17 - 279:25	401, 402, 403, 801, 802 805.
280:15 - 280:18	401, 402, 403.
283:8 - 283:15	401, 402, 403, 602.
297:12 - 297:24	

November 18, 2021 Deposition of Bethany Brazier

Plaintiffs' Designation	Defendant's Objection(s)
8:17 - 8:19	
16:6 - 16:13	
16:22 - 17:7	
17:11 - 17:12	
17:17 - 17:21	
21:8 - 21:11	
21:19 - 21:21	
22:15 - 22:21	
23:6 - 23:11	
23:16 - 23:22	
27:18 - 27:20	401, 402, 403.
28:15 - 28:20	401, 402, 403.
28:21 - 30:8	401, 402, 403.
31:7 - 31:20	401, 402, 403.
32:10 - 32:17	401, 402, 403.
33:8 - 33:22	401, 402, 403.
34:7 - 34:9	401, 402, 403.
35:9 - 35:16	401, 402, 403.
36:24 - 38:22	401, 402, 403.
39:21 - 39:25	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
40:8 - 40:18	401, 402, 403.
41:6 - 42:6	401, 402, 403.
42:17 - 42:20	401, 402, 403.
43:6 - 43:11	401, 402, 403. Defendant conditionally designates 43:19 – 44:5, only if objections to 32:10 – 43:19 are overruled.
44:11 - 44:19	401, 402, 403.
44:21 - 45:18	401, 402, 403.
47:6 - 47:24	401, 402, 403.
50:16 - 51:6	401, 402, 403.
51:19 - 51:21	401, 402, 403.
53:23 - 54:14	401, 402, 403.
59:10 - 60:4	401, 402, 403, 602.
61:13 - 61:17	401, 402, 403.
74:8 - 74:14	
76:5 - 76:24	401, 402, 403.
77:18 - 77:22	401, 402, 403.
78:10 - 78:21	401, 402, 403.
81:14 - 82:13	401, 402, 403.
84:22 - 85:22	401, 402, 403.
86:3 - 86:10	401, 402, 403.
86:17 - 86:20	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
87:4 - 87:13	401, 402, 403.
89:24 - 90:4	401, 402, 403.
90:19 - 90:21	401, 402, 403.
91:23 - 91:25	401, 402, 403.
92:11 - 92:17	401, 402, 403.
95:5 - 96:12	401, 402, 403, MPSJ.
97:11 - 97:18	401, 402, 403, MPSJ.
97:19 - 98:4	401, 402, 403, MPSJ.
99:21 - 100:11	401, 402, 403.
101:4 - 101:15	401, 402, 403.
101:22 - 102:2	401, 402, 403.
102:20 - 104:16	401, 402, 403.
109:6 - 109:16	401, 402, 403.
109:19 - 110:21	401, 402, 403.
112:3 - 112:5	401, 402, 403.
113:2 - 113:10	
166:23 - 167:4	401, 402, 403, 602.
167:12 - 168:22	401, 402, 403.
172:15 - 172:19	401, 402, 403.
173:10 - 174:2	401, 402, 403.
183:16 - 185:4	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
189:15 - 189:21	
192:11 - 192:19	
193:4 - 193:9	
194:13 - 194:18	
195:21 - 196:18	401, 402, 403.
196:20 - 196:23	
197:11 - 197:18	401, 402, 403.
198:14 - 198:21	401, 402, 403.
198:24 - 199:13	
199:23 – 200:5	
200:6 – 202:19	401, 402, 403.
204:3 - 204:14	401, 402, 403.
205:18 - 206:6	401, 402, 403.
209:9 - 209:22	401, 402, 403.
211:12 - 214:6	401, 402, 403.
214:11 - 214:19	
214:22 - 217:5	401, 402, 403.
218:3 - 219:2	401, 402, 403.
219:10 - 219:14	401, 402, 403.
228:11 - 228:22	401, 402, 403.
229:18 - 229:20	401, 402, 403, MPSJ.

Plaintiffs' Designation	Defendant's Objection(s)
230:3 - 233:4	401, 402, 403, MPSJ.
233:23 - 234:14	401, 402, 403, MPSJ.

August 23, 2021 Deposition of Marquita Crawford 30(b)(6)
Witness for Trinity Services Group, LLP

Plaintiffs' Designation	Defendant's Objection(s)
276:2 - 277:8	
280:2 - 280:19	
281:1 - 281:4	
286:15 - 287:1	
287:2 - 287:9	
287:18 - 287:22	
288:3 - 289:21	
289:22 - 290:7	
290:8 - 290:14	
292:10 - 293:11	
294:6 - 294:25	
295:4 - 295:10	
297:23 - 298:24	401, 402, 403.
298:25 - 299:2	401, 402, 403.
299:3 - 299:21	
300:14 - 300:17	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
305:3 - 305:8	
306:10 - 306:16	
306:19 - 307:6	
310:2 - 310:19	
313:8 - 313:22	
314:5 - 314:25	401, 402, 403.
317:9 - 319:3	401, 402, 403.
319:15 - 319:23	401, 402, 403.
325:21 - 326:3	401, 402, 403.
326:15 - 326:23	401, 402, 403.
328:10 – 329:1 (through “... volunteers.”)	401, 402, 403.
329:1 (starting with “Is that”) - 330:16	
331:17 - 333:18	401, 402, 403, 602.
335:21 - 336:5	
337:7 - 338:4	401, 402, 403.
340:24 - 341:2	401, 402, 403.
341:3 – 341:11	
341:15 - 341:18	
342:4 - 342:9	
343:7 - 343:13	
344:5 - 344:17	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
345:18 - 346:13	401, 402, 403.
346:14 - 347:4	401, 402, 403.
347:13 - 347:15	401, 402, 403.
348:23 - 350:8	
350:14 - 350:16	
360:10 - 360:24	
371:11 - 372:4	
372:22 - 373:5	401, 402, 403.
374:4 - 374:21	401, 402, 403.
377:14 - 377:22	401, 402, 403.
378:6 - 380:12	401, 402, 403.
380:18 - 380:21	401, 402, 403.
385:25 - 386:10	
387:4 - 390:1	401, 402, 403.
390:2	401, 402, 403.
390:3 – 390:15	
392:5 - 392:22	
393:3 - 393:9	
393:10 - 393:20	401, 402, 403
394:13 - 394:23	401, 402, 403.
395:1 – 395:22	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
395:23 - 396:2	
397:21 - 398:7	
400:8 - 400:18	
402:23 - 405:9	602
414:1 - 415:18	401, 402, 403, 602.
416:7 - 416:10	
417:2 - 417:24	
417:25 - 418:13	
419:23 - 420:12	
420:17 - 420:23	
421:18 - 421:20	
422:10 - 422:23	
423:9 - 425:6	
425:14 - 425:16	
427:7 - 427:21	
428:20 - 429:7	
429:9 - 430:8	
431:22 - 431:24	
432:10 - 432:14	
432:15 - 432:18	
440:22 - 441:1	

Plaintiffs' Designation	Defendant's Objection(s)
455:19 - 456:5	
460:1 - 460:5	
480:17 - 485:20	401, 402, 403.
486:25 - 487:7	
490:5 - 492:7	
492:15 - 494:1	
494:20 - 495:4	
495:15 - 497:8	
498:10 - 500:3	
500:10 - 502:4	
503:22 - 504:2	

December 3, 2021 Deposition of Juliette Drew

Plaintiffs' Designation	Defendant's Objection(s)
17:19 - 18:19	
21:2 - 21:5	
21:9 - 21:18	
21:21 - 22:8	
26:15 – 26:23	
26:24 - 27:16	401, 402, 403.
29:13 - 31:2	401, 402, 403.
31:20 - 32:13	401, 402, 403.
34:15 - 37:18	401, 402, 403.
37:23 - 38:9	401, 402, 403.
38:13 - 38:17	401, 402, 403.
39:8 - 41:9	401, 402, 403.
42:14 - 43:10	401, 402, 403.
47:19 - 47:22	401, 402, 403.
50:17 - 51:9	401, 402, 403.
59:8 - 61:9	401, 402, 403.
62:18 - 63:24	401, 402, 403.
66:14 - 69:11	401, 402, 403.
72:8 - 72:18	401, 402, 403.
74:16 - 75:2	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
75:11 - 75:15	401, 402, 403.

October 27, 2021 Deposition of Harrell Gray

Plaintiffs' Designation	Defendant's Objection(s)
17:12 - 17:15	
17:20 - 17:22	
18:23 - 18:25	
20:18 - 21:15	
21:20 - 21:24	401, 402, 403.
22:18 - 22:25	
24:16 - 24:22	
25:5 - 25:9	
25:15 - 25:19	
25:23 - 27:14	
28:5 - 28:6	
31:8 - 31:10	
32:13 - 33:7	401, 402, 403.
34:3 - 34:8	401, 402, 403.
37:17 - 37:23	
38:16 - 38:18	401, 402, 403.
39:5 - 39:9	401, 402, 403, 602.
39:21 - 40:16	401, 402, 403, 602.

Plaintiffs' Designation	Defendant's Objection(s)
45:2 - 45:11	
48:11 - 50:9	
51:22 - 52:2	
52:9 - 54:4	401, 402, 403.
54:8 - 55:12	401, 402, 403.
55:16 - 57:4	401, 402, 403.
59:4 – 60:19	
60:20 – 61:6	403
61:24 - 62:1	401, 402, 403.
62:6 - 63:13	401, 402, 403, 602.
64:6 - 65:25	401, 402, 403. Also, 602 with respect to 65:11-25.
70:13 - 70:21	401, 402, 403.
70:22 - 72:11	401, 402, 403.
74:16 - 75:2	401, 402, 403
75:16 - 76:18	401, 402, 403.
77:21 - 78:10	401, 402, 403.
78:24 - 79:15	401, 402, 403.
79:17 - 80:8	401, 402, 403.
81:17 - 82:2	401, 402, 403.
82:4 - 83:6	401, 402, 403.
83:8 - 83:20	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
84:22 - 85:2	
85:5 - 85:9	
85:12 - 86:2	
87:15 - 87:22	401, 402, 403, 602.
92:20 - 95:2	401, 402, 403.
95:24 - 96:3	401, 402, 403.
97:18 - 97:21	401, 402, 403
97:22 - 98:20	401, 402, 403.
100:11 - 101:14	
101:16 - 102:13	
102:14 - 102:17	
102:18 - 107:9	401, 402, 403
108:2 - 109:2	401, 402, 403.
110:17 - 112:17	401, 402, 403.
117:14 - 121:11	
128:19 - 131:17	401, 402, 403, 602.
132:6 - 133:13	401, 402, 403.
135:8 - 135:18	401, 402, 403.
136:6 - 137:9	401, 402, 403.
137:21 - 142:4	401, 402, 403.
142:6 - 143:6	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
143:10 - 145:9	401, 402, 403.
146:8 - 151:5	401, 402, 403.
152:3 - 153:14	401, 402, 403, 602.
154:9 - 155:12	401, 402, 403, 602.
155:25 - 156:13	401, 402, 403.
157:9 - 158:2	401, 402, 403.
160:24 - 161:21	401, 402, 403.
162:8 - 164:10	401, 402, 403, 602.
164:17 - 165:25	401, 402, 403, 602.
168:5 - 170:19	401, 402, 403, 602.
180:24 - 182:9	401, 402, 403.
183:9 - 183:20	401, 402, 403.
193:9 - 196:23	401, 402, 403.
203:16 - 205:18	401, 402, 403.
213:12 - 213:19	
214:15 - 214:21	
215:5 - 215:14	
216:17 - 217:10	
218:5 - 218:18	
219:13 - 219:25	
220:7 - 221:13	

Plaintiffs' Designation	Defendant's Objection(s)
221:22 – 222:11	
222:12 – 224:10	602.
224:12 - 225:11	
230:10 - 230:13	401, 402, 403.
231:2 - 232:2	401, 402, 403.
232:6 - 232:21	401, 402, 403.
232:22 - 234:15	401, 402, 403.
236:8 - 236:19	401, 402, 403.
237:5 - 237:15	401, 402, 403.
238:22 - 239:15	401, 402, 403.
242:20 - 243:8	401, 402, 403.
253:14 - 258:17	401, 402, 403.
258:19 - 259:6	401, 402, 403.
260:11 - 260:24	401, 402, 403.
261:7 - 261:14	401, 402, 403.
276:5 - 276:9	
276:19 - 278:16	
280:13 - 281:25	

October 22, 2021 Deposition of Freddie Hood

Plaintiffs' Designation	Defendant's Objection(s)
20:21 - 20:22	401, 402, 403.
21:6 - 21:8	401, 402, 403.
21:17 - 21:22	401, 402, 403.
21:23 - 21:25	
22:20 - 22:22	
23:13 - 23:15	
25:2	401, 402, 403.
25:3 – 25:5	
25:19 - 25:23	401, 402, 403.
29:12 – 29:23	401, 402, 403.
29:24 - 30:8	
32:16 - 32:19	
33:5 - 33:10	
43:19 - 43:24	
45:17 - 45:21	
47:23 - 47:25	
54:24 - 55:2	401, 402, 403.
55:9 - 56:22	401, 402, 403.
60:18 - 60:19	401, 402, 403.
61:7 - 61:22	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
63:3 - 63:15	
65:24 - 65:25	401, 402, 403.
66:5 - 67:4	401, 402, 403.
67:21 - 68:3	401, 402, 403.
69:18 - 69:20	401, 402, 403.
69:24 - 70:20	401, 402, 403.
71:5 - 72:8	401, 402, 403.
72:23 - 72:24	401, 402, 403.
73:4 - 73:20	401, 402, 403.
74:17 - 75:14	401, 402, 403.
77:3 - 77:4	401, 402, 403.
78:17 - 78:20	401, 402, 403.
78:21 - 79:20	401, 402, 403.
84:19 - 85:9	401, 402, 403.
89:6 - 89:16	401, 402, 403.
89:22 - 90:10	401, 402, 403.
90:3 - 90:10	401, 402, 403.
90:25 - 94:8	401, 402, 403.
94:11 - 94:22	401, 402, 403.
95:5 - 95:11	401, 402, 403.
98:10 - 98:21	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
99:16 - 100:2	401, 402, 403.
101:16 - 103:5	401, 402, 403.
109:22 - 112:17	401, 402, 403.
121:7 - 121:20	401, 402, 403.
125:8 - 125:9	401, 402, 403.
125:13 - 125:24	
126:20 - 127:15	401, 402, 403.
137:2 - 137:11	401, 402, 403.
141:21 - 141:23	401, 402, 403.
142:3 - 142:10	401, 402, 403.
145:17 - 145:20	401, 402, 403.
146:4 - 146:10	401, 402, 403.
153:15 - 154:9	
166:8 - 166:15	
171:21 - 172:14	
172:17 - 173:14	
175:14 - 176:7	
178:8 - 182:6	401, 402, 403.
182:14 - 182:21	401, 402, 403.
182:25 - 185:15	401, 402, 403.
188:2 - 188:5	

Plaintiffs' Designation	Defendant's Objection(s)
189:3 - 189:12	
190:4 - 191:16	
198:15 - 198:24	401, 402, 403.
199:21 - 200:13	401, 402, 403.
200:19 - 200:23	401, 402, 403.
201:25 - 205:25	401, 402, 403.
206:5 - 206:11	401, 402, 403.
206:14 - 206:15	401, 402, 403.
207:6 - 207:22	401, 402, 403.
207:24 – 208:18	401, 402, 403.
208:19 – 209:3	
213:21 - 213:22	401, 402, 403.
214:3 - 215:20	401, 402, 403.
215:22 - 217:13	401, 402, 403.
218:13 - 218:23	401, 402, 403.
220:19 - 221:20	401, 402, 403.
232:11 - 232:20	401, 402, 403.
233:13 - 233:25	401, 402, 403.

Plaintiffs' counter-designations

Plaintiffs' Counter	Defendant's Objection(s)
53:13 - 54:7	401, 402, 403.

Plaintiffs' Counter	Defendant's Objection(s)
115:2 - 115:12	401, 402, 403.
123:8 - 123:11	
124:3 - 124:8	
155:5 - 155:20	
176:21 - 177:2	
186:2 - 186:11	401, 402, 403, 602.
200:9 - 200:13	401, 402, 403.
206:16 - 207:5	401, 402, 403.
212:7 - 212:12	
240:10 - 240:12	
241:2 - 241:2	401, 402, 403.
241:6 - 241:6	401, 402, 403.
241:25 - 241:25	401, 402, 403. However, Defendant does not object to adding 242:2, which is the answer to the designated question.
242:15 - 242:15	401, 402, 403.

July 14, 2021 Deposition of Susan Huffman
30(b)(6) Witness for Trinity Services Group, LLP

Plaintiffs' Designation	Defendant's Objection(s)
8:1 - 8:5	
8:24 - 9:7	
9:23 - 10:17	

Plaintiffs' Designation	Defendant's Objection(s)
11:17 - 11:22	
22:21 - 23:12	
23:13 - 23:19	
27:7 - 27:20	
28:13 - 28:16	
33:22 - 34:8	
37:8 - 37:12	
38:21 - 38:23	
40:7 - 40:23	
41:10 - 41:17	
41:18 - 42:2	401, 402, 403.
43:15 - 43:17	
43:20 - 44:12	
46:7 - 46:9	
47:3 - 47:5	
52:11 - 52:24	
53:3 - 53:6	
55:10 - 55:16	
63:23 - 64:9	
60:10 - 64:16	602, 701.
65:22 - 66:6	602, 701.

Plaintiffs' Designation	Defendant's Objection(s)
72:10 - 72:13	
73:18 - 73:20	401, 402, 403.
75:14 - 75:18	
79:24 - 80:4	
81:13 - 82:6	401, 402, 403.
87:22 - 88:24	
89:8 - 89:16	
89:17 - 89:25	
92:14 - 92:25	401, 402, 403.
93:5 - 93:15	401, 402, 403.
94:7 - 96:21	401, 402, 403.
97:24 - 98:14	401, 402, 403.
98:15 - 99:7	401, 402, 403.
99:14 - 100:6	
103:11 - 103:14	
103:19 - 104:2	
105:2 - 106:19	
107:6 - 107:11	
112:8 - 112:13	
118:18 - 118:24	401, 402, 403.
119:24 - 120:25	

Plaintiffs' Designation	Defendant's Objection(s)
122:5 - 123:3	
123:7 - 123:16	
131:3 - 131:17	
131:18 - 132:3	401, 402, 403.
132:4 - 139:9	
134:13 - 134:16	
135:18 - 135:21	
136:2 - 136:8	
136:12 - 136:14	
136:21 - 136:23	
141:11 - 141:24	
143:9 - 145:3	
146:6 - 146:22	
147:20 - 148:5	
149:5 - 149:14	401, 402, 403, 801, 802.
158:14 - 160:4	
160:21 - 162:2	
162:8 - 162:21	
164:1 - 164:7	
165:19 - 165:23	
166:6 - 166:14	

Plaintiffs' Designation	Defendant's Objection(s)
166:24 - 167:9	
169:3 - 169:24	
169:25 - 172:2	
172:19 - 172:25	401, 402, 403.
173:11 - 173:17	
191:25 - 192:1	
192:10 - 192:14	
193:4 - 194:19	
198:25 - 199:7	
207:21 - 208:11	
221:14 - 221:19	
223:16 - 225:25	
229:24 - 230:7	
232:12 - 232:17	401, 402, 403.
232:18 - 232:23	401, 402, 403.
233:1 - 233:12	401, 402, 403.
241:7 - 241:19	
244:5 - 246:7	401, 402, 403.
246:8 - 246:11	401, 402, 403.
249:12 - 249:19	401, 402, 403.
250:4 - 250:11	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
251:2 - 251:16	401, 402, 403.

October 5, 2021 Deposition of Terrence Lane

Plaintiffs' Designation	Defendant's Objection(s)
15:19 - 15:25	
16:6 - 16:19	
18:12 - 18:15	
24:11 - 24:14	
38:17 - 39:2	401, 402, 403.
39:12 - 39:17	401, 402, 403.
52:8 - 53:4	
53:21 - 53:23	
55:24 - 56:8	
56:20 - 57:3	
59:24 - 60:5	
60:13 - 60:15	
60:19 - 61:7	
62:16 - 64:18	
65:5 - 65:24	
66:25 - 66:4	
93:16 - 93:20	
98:24 - 99:5	

Plaintiffs' Designation	Defendant's Objection(s)
100:3 - 100:7	
101:9 - 101:14	
101:16 - 101:21	
103:25 - 104:9	
105:6 - 105:12	
106:3 - 106:9	
107:16 - 107:22	
119:3 - 119:16	
130:2 - 130:3	
130:7 - 130:7	
130:14 - 130:14	
131:5 - 133:17	401, 402, 403.
136:7 - 136:21	
138:18 - 138:20	
138:24 - 139:15	
139:25 - 143:9	
144:15 - 145:17	
148:11 - 148:18	
149:7 - 149:14	
150:6 - 150:14	
151:4 - 151:6	

Plaintiffs' Designation	Defendant's Objection(s)
151:10 - 151:12	
151:20 - 152:9	401, 402, 403.
152:18 - 153:16	
153:22 - 154:13	
154:24 - 155:9	
169:11 - 169:12	
169:16 - 171:4	
191:8 - 191:23	
192:3 - 192:15	401, 402, 403.
193:23 - 194:11	401, 402, 403.
194:16 - 194:18	401, 402, 403.
194:23 - 196:6	401, 402, 403.
200:17 - 200:18	
200:23 - 201:4	401, 402, 403.
201:8 - 201:12	401, 402, 403.
202:9 - 202:12	401, 402, 403.
202:15 - 202:19	401, 402, 403.
212:19 - 212:22	
213:10 - 213:17	
214:6 - 214:16	
225:7 - 226:5	

Plaintiffs' Designation	Defendant's Objection(s)
226:17 - 227:10	
238:4 - 238:19	
252:17 - 252:19	
254:22 - 255:4	

Plaintiffs' counter-designations

Plaintiffs' Counter	Defendant's Objection(s)
22:2 - 22:4	
40:2 - 40:4	
72:11 - 72:17	
77:11 - 77:14	
77:22 - 78:2	
99:3 - 99:5	
102:11 - 102:17	
102:23 - 103:4	
135:20 - 136:3	
184:15 - 184:17	401, 402, 403.
184:23 - 184:24	401, 402, 403.
184:25 - 185:3	401, 402, 403.
185:7 - 185:10	401, 402, 403.
186:20 - 186:24	

Plaintiffs' Counter	Defendant's Objection(s)
187:16 - 188:4	401, 402, 403.
189:6 - 189:15	401, 402, 403.
189:24 - 190:9	
224:16 - 225:6	401, 402, 403.
239:8 - 239:24	
241:23 - 242:2	
246:13 - 247:11	401, 402, 403.

October 21, 2021 Deposition of Matthew Moye

Plaintiffs' Designation	Defendant's Objection(s)
7:21 - 7:25	
8:21 - 8:25	
13:23 - 13:25	
18:25 - 19:21	
20:13 - 20:23	401, 402, 403.
22:9 - 22:21	401, 402, 403.
25:15 - 27:4	
29:21 - 30:8	
32:13 - 33:6	
33:16 - 34:12	106. 34:13-18 must be included to maintain the integrity of the testimony.
34:18 - 34:24	

Plaintiffs' Designation	Defendant's Objection(s)
35:3 - 36:10	401, 402, 403.
39:7 - 39:18	
41:25 - 43:3	401, 402, 403.
43:4 - 43:7	401, 402, 403.
43:22 - 44:3	
48:15 - 49:16	401, 402, 403.
50:18 - 52:9	
52:10 - 52:13	401, 402, 403.
52:23 - 53:12	401, 402, 403.
54:24 - 57:21	401, 402, 403.
58:2 - 58:18	401, 402, 403.
59:7 - 59:16	401, 402, 403.
59:22 - 60:24	401, 402, 403.
61:12 - 61:15	
62:16 - 63:3	401, 402, 403.
64:4 - 64:7	401, 402, 403, Foundation.
65:16 - 66:12	401, 402, 403.
67:15 - 68:20	401, 402, 403.
68:24 - 70:6	401, 402, 403.
70:22 - 71:20	401, 402, 403.
72:3 - 72:19	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
75:5 - 76:10	401, 402, 403.
77:3 - 77:18	401, 402, 403, Speculation, Foundation.
77:20 - 78:9	401, 402, 403, Speculation, Foundation.
84:5 - 84:8	401, 402, 403.
84:15 - 87:10	401, 402, 403.
88:3 - 88:17	401, 402, 403.
89:2 - 89:11	401, 402, 403.
92:15 - 93:8	
96:8 - 96:17	401, 402, 403.
97:14 - 100:2	401, 402, 403.
100:4 - 100:19	
101:16 - 103:3	401, 402, 403.
104:14 - 104:17	401, 402, 403.
104:23 - 106:25	401, 402, 403.
109:20 - 110:24	
121:10 - 122:21	401, 402, 403.
127:3 - 127:21	401, 402, 403.
127:25 - 128:19	401, 402, 403.
128:23 - 130:3	401, 402, 403.
131:9 - 131:25	
132:10 - 132:15	

Plaintiffs' Designation	Defendant's Objection(s)
132:17 - 133:14	401, 402, 403, Speculation, Foundation.
135:6 - 135:12	401, 402, 403.
143:22 - 144:14	401, 402, 403.
149:19 - 150:22	
151:9 - 158:11	401, 402, 403.
168:13 - 169:18	401, 402, 403.
170:3 - 170:16	
170:22 - 171:11	
173:6 - 174:6	401, 402, 403.
174:8 - 174:17	401, 402, 403.
174:23 - 176:18	401, 402, 403.
176:22 - 177:24	401, 402, 403.
178:10 - 180:23	401, 402, 403.
182:7 - 182:11	401, 402, 403.
182:12 - 182:16	401, 402, 403.
182:18 - 183:5	401, 402, 403.
188:6 - 189:22	401, 402, 403.
191:12 - 192:10	401, 402, 403.
195:14 - 195:17	401, 402, 403.
195:23 - 198:4	401, 402, 403.
204:14 - 205:8	

Plaintiffs' Designation	Defendant's Objection(s)
205:12 - 206:16	
208:3 - 208:3	401, 402, 403.
208:6 - 208:6	401, 402, 403.
208:10 - 214:7	401, 402, 403.
214:16 - 214:21	401, 402, 403.
215:12 - 216:2	401, 402, 403.
220:24 - 221:10	401, 402, 403.
221:25 - 222:5	401, 402, 403.
225:23 - 226:22	401, 402, 403.
228:15 - 229:20	401, 402, 403.
230:5 - 230:20	401, 402, 403.

October 18, 2021 Deposition of Charlie Peterson

Plaintiffs' Designation	Defendant's Objection(s)
23:21 - 24:16	
28:2 - 28:7	
28:21 - 29:11	
44:3 - 45:8	401, 402, 403.
61:9 - 61:12	
78:25 - 79:4	
79:12 - 80:2	
80:17 - 81:2	

Plaintiffs' Designation	Defendant's Objection(s)
81:3 - 82:21	401, 402, 403.
111:11 - 114:5	
135:18 - 136:3	
136:8 - 136:18	
152:7 - 153:6	
156:15 - 157:23	
158:4 - 158:6	
170:11 - 173:2	
173:8 - 174:9	
182:25 - 184:3	
184:20 - 184:25	
186:17 - 186:21	
187:24 - 188:15	
210:5 - 210:24	
211:15 - 212:4	
214:11 - 215:18	
216:19 - 216:21	
217:22 - 218:14	
222:12 - 222:20	
222:21 - 223:10	
232:13 - 234:19	401, 402, 403.

Plaintiffs' Designation	Defendant's Objection(s)
234:21 - 234:24	
235:18 - 238:2	401, 402, 403

Plaintiffs' counter-designations

Plaintiffs' Counter	Defendant's Objection(s)
14:6 - 14:12	
50:4 - 50:13	
66:17 - 68:8	401, 402, 403.
86:23 - 87:16	
87:17 - 87:23	401, 402, 403, Foundation.
100:20 - 100:25	
114:7 - 114:10	
148:5 - 148:21	401, 402, 403, Foundation.
154:7 - 154:23	
159:6 - 159:8	
192:11 - 193:6	
196:17 - 197:22	
211:3 - 211:13	401, 402, 403, Foundation.
238:23 - 240:25	401, 402, 403, Foundation.

September 30, 2021 Deposition of Troy Pollock

Plaintiff's Designation	Defendant's Objection(s)

Plaintiff's Designation	Defendant's Objection(s)
7:18 - 7:22	
16:11 - 16:15	
17:20 - 17:25	
18:2 - 18:19	
25:3 - 25:11	
26:17 - 26:20	
27:23 - 28:7	
29:7 - 29:16	
29:20 - 30:9	
30:25 - 31:7	
31:16 - 31:22	
34:10 - 34:14	
34:21 - 34:25	
45:16 - 46:6	
53:17 - 54:16	
55:13 - 56:6	
57:20 - 59:14	
59:16 - 61:10	
78:23 - 79:16	
81:25 - 82:15	
83:10 - 84:3	

Plaintiff's Designation	Defendant's Objection(s)
116:25 - 117:18	
122:23 - 123:15	
124:11 - 124:20	
142:12 - 143:5	401, 402, 403, Foundation.
144:3 - 145:10	
148:18 - 149:24	
151:3 - 152:16	401, 402, 403.
155:19 - 156:9	401, 402, 403.
160:4 - 164:25	401, 402, 403.
166:9 - 167:9	
167:18 - 168:14	
168:15 - 169:6	401, 402, 403.
169:7 - 169:13	
169:14 - 170:4	401, 402, 403.
180:2 - 181:2	
210:23 - 211:6	
211:14 - 211:16	
222:15 - 222:20	
222:25 - 223:8	

November 2, 2021 Deposition of Michael Swinton

Plaintiff's Designation	Defendant's Objection(s)
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Plaintiff's Designation	Defendant's Objection(s)
15:17 - 17:25	
28:7 - 28:18	401, 402, 403.
30:6 - 30:11	
32:21 - 33:6	
35:13 - 36:7	401, 402, 403.
36:23 - 36:25	401, 402, 403.
40:11 - 41:10	401, 402, 403.
43:23 - 44:14	401, 402, 403.
54:11 - 55:24	
56:22 - 57:5	
73:25 - 74:20	
75:21 - 76:10	401, 402, 403.
81:8 - 81:20	401, 402, 403.
83:25 - 84:6	401, 402, 403.
84:22 - 85:7	401, 402, 403.
85:13 - 86:14	401, 402, 403.
90:20 - 91:13	
109:10 – 111:20	401, 402, 403.
111:21 – 115:7	
118:5 - 119:22	
126:10 - 126:23	

Plaintiff's Designation	Defendant's Objection(s)
128:14 - 130:14	
134:16 - 135:14	
137:5 - 137:12	401, 402, 403.
159:4 - 159:25	
169:15 - 169:21	401, 402, 403.
169:22 - 170:4	401, 402, 403.
178:3 - 178:21	
179:23 - 180:18	
180:23 - 181:11	
181:12 - 183:11	
185:8 - 185:16	
186:20 - 187:21	
190:9 - 191:7	401, 402, 403.
193:25 - 194:20	401, 402, 403.
195:7 - 195:16	
205:1 - 209:4	401, 402, 403.
209:17 - 211:6	
214:10 – 215:2	401, 402, 403.
215:3 – 216:12	
216:25 - 217:23	
219:17 - 221:4	

Plaintiff's Designation	Defendant's Objection(s)
222:19 - 223:16	
223:20 - 224:4	
224:16 - 225:3	401, 402, 403.
226:16 - 227:11	401, 402, 403.
228:7 - 228:17	401, 402, 403.
234:17 - 234:20	401, 402, 403.

December 1-2, 2021 Deposition of Russell Washburn
30(b)(6) Witness for CoreCivic, Inc.

Plaintiff's Designation	Defendant's Objection(s)
13:15 - 14:3	
20:8 - 21:6	
22:12 - 24:2	
24:9 - 24:19	
25:7 - 25:9	
31:7 - 31:17	
32:14 - 33:14	
38:22 - 39:23	
42:17 - 43:10	
43:11 - 44:7	401, 402, 403.
44:8 - 45:23	
50:8 - 50:11	

Plaintiff's Designation	Defendant's Objection(s)
54:3 - 54:18	
55:14 - 55:15	
59:20 - 60:6	
60:17 - 60:22	
62:4 - 63:16	
65:13 - 65:22	401, 402, 403.
69:2 - 70:15	401, 402, 403.
71:22 - 72:23	401, 402, 403.
74:12 - 75:6	401, 402, 403.
78:9 - 79:9	401, 402, 403.
80:9 - 80:14	401, 402, 403.
80:24 - 84:14	401, 402, 403.
97:13 - 100:15	
107:19 - 109:18	
113:11 - 117:7	401, 402, 403.
118:24 - 119:12	
119:19 - 120:3	
132:18 - 133:19	
143:2 - 143:15	
145:24 - 146:2	
146:18 - 146:20	

Plaintiff's Designation	Defendant's Objection(s)
150:17 - 152:19	
156:16 - 156:23	
159:8 - 159:24	
162:22 - 167:7	401, 402, 403.
168:19 - 169:2	
173:17 - 174:7	
178:4 - 180:7	
184:12 - 184:21	
186:7 - 186:25	
188:20 - 189:8	
190:25 - 199:22	401, 402, 403.
203:7 - 203:24	
204:3 - 204:23	
206:5 - 206:22	
212:11 - 214:25	
212:14 - 214:25	
215:5 - 215:19	
216:21 - 217:17	
217:21 - 218:4	
218:23 - 222:5	
224:21 - 225:11	

Plaintiff's Designation	Defendant's Objection(s)
228:14 - 228:19	
228:20 - 231:22	401, 402, 403.
232:17 - 232:19	
232:23 - 236:6	401, 402, 403.
236:18 - 236:22	
237:20 - 241:24	401, 402, 403.
245:10 - 246:3	
246:19 - 247:19	
247:20 - 249:10	401, 402, 403.
250:17 - 250:25	401, 402, 403.
251:2 - 251:23	
251:24 - 253:13	
251:24 - 253:2	
254:12 - 254:25	
257:6 - 257:16	
257:18 - 258:5	
259:3 - 259:13	
259:14 - 267:13	
259:14 - 260:18	
267:14 - 268:9	
268:12 - 269:3	401, 402, 403, Foundation.

Plaintiff's Designation	Defendant's Objection(s)
269:4 - 269:11	
269:12 – 269:14	401, 402, 403.
269:15 – 269:19	
290:6 - 291:14	
296:25 - 297:14	401, 402, 403.
313:8 - 314:12	
315:12 - 317:14	
319:2 - 320:4	401, 402, 403
320:5 - 320:11	
325:7 - 325:21	401, 402, 403
356:19 - 358:7	
362:4 - 362:21	
373:9 - 374:25	
376:21 - 377:10	
380:5 - 380:21	
387:13 - 388:5	
397:24 - 398:13	
416:19 - 420:4	

Dated: August 29, 2023

Respectfully submitted,

s/ Jacob B. Lee

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of August, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

N/A

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